

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION

ALONZO AUSTIN	)	
	)	
Plaintiff,	)	
	)	
v.	)	3:07-cv-754-MHT
	)	
CITY OF TUSKEGEE, <i>et al.</i> ,	)	
	)	
Defendants.	)	

**INTERROGATORIES TO PLAINTIFF ALONZO AUSTIN**

COME NOW Defendants, by and through the undersigned counsel of record, and propound the following Interrogatories to Plaintiff Alonzo Austin to be answered under oath and updated in accordance with the *Federal Rules of Civil Procedure*:

1. State the following identifying information:
  - a. your full legal name;
  - b. any other names that you currently use, or any other names that you have used in the past;
  - c. your date and place of birth;
  - d. your social security number;
  - e. your current residence address and mailing address;
  - f. the name of your spouse;

- g. your educational background; and
- h. the issuing state and number of your driver's license.

2. For each employer that you have had within the past ten (10) years from the present date, state the following:

- a. name, address, and telephone number;
- b. your job titles and duties;
- c. your rate of pay or salary;
- d. the dates of each employment; and
- e. your reason for leaving each employment.

3. If you contend that the incidents made the basis of your lawsuit caused you to suffer any bodily injury, physical illness, mental illness, or emotional distress, for each doctor, hospital, clinic, therapist, counselor, or care provider that has treated you or examined you for the same, state the following:

- a. name, address, and telephone number;
- b. the reason for treatment; and
- c. the dates of treatment.

4. If you responded affirmatively to Interrogatory 3, for each doctor, hospital, therapist, counselor, or care provider that has treated or examined you for any reason in the last 15 years, state the following:

- a. name, address, and telephone number;
- b. the reason for treatment; and
- c. the dates of treatment.

5. State the name, residence address, and telephone number, and business address and telephone number, of each witness who can testify based on their personal knowledge that the Plaintiff was outside the Tuskegee city limits at the time the traffic violation made the basis of this lawsuit occurred.

6. State the name, residence address, and telephone number, and business address and telephone number, of each witness who can testify based on their personal knowledge that the Plaintiff was not exceeding the posted speed limit within the Tuskegee city limits at the time of, and immediately prior to, the incident made the basis of this lawsuit.

7. State the name, residence address, and telephone number, and business address and telephone number, of each witness who will testify to the custom, policy, or practice of the City of Tuskegee to intentionally, willfully, or knowingly operate an illegal “speed trap” outside the city limits of Tuskegee as alleged in the Complaint.

8. List in detail all monetary damages that you claim to be owed to you by these Defendants, and your method for computing the same, as a result of the incidents made the basis of this lawsuit.

9. State the name, residence address and telephone number, and business address and telephone number of each person having knowledge of the facts, details, or information of the matter complained of in this case.

10. State in detail your version of the traffic stop made the basis of this lawsuit and all facts that you contend prove your allegations against these Defendants.

11. For each expert that you have consulted, retained, or that you intend to have testify at trial, state the following:

- a. name, address, and telephone number;
- b. subject matter to which each expert is expected to testify;
- c. substance of the facts and opinions on which the expert is expected to testify; and
- d. a list of all cases in which the expert has given expert opinions or testimony, identifying the name and address of the attorney who employed the expert, and the style of the case.

12. State if you have ever been arrested or convicted (found guilty, adjudicated guilty, pled no contest, and/or pled guilty) for any misdemeanor or felony criminal offense. If yes, state the following:

- a. the offense;
- b. the name under which you were arrested and/or convicted;
- c. the date of arrest;
- d. the date of conviction or dismissal;
- e. the name and location of the Court;
- f. sentence imposed; and
- g. date of sentence completion.

13. State whether you have ever been involved in any lawsuits, including collection actions or bankruptcies, in the ten (10) years prior to this date. If yes, list all lawsuits filed by, or against you, setting forth:

- a. the style of the case;
- b. the Court where the matter was tried or is pending;
- c. the case number assigned to the case;
- d. the present status or resolution of the case; and
- e. the type of case.

14. For each traffic citation or arrest you have received within the last ten (10) years, state the following:

- a. date of the offense or violation;
- b. describe the offense or violation;

- c. identify the Court where the matter was tried, processed, or is pending; and
- d. the disposition of the case and sentence imposed.

15. For each of your relatives who are at least 18 years of age and reside in Macon County, Alabama, state the following:

- a. full name and relationship to the Plaintiff;
- b. date of birth;
- c. residence address;
- d. place of employment; and
- e. spouse's name.

s/S. Mark Dukes  
S. MARK DUKES (ASB-9697-U77S)  
Counsel for Defendants City of Tuskegee,  
Mayor Johnny Ford, Judge Albert C. Bulls,  
III, Chief Lester Patrick, Honorable R.  
Keith Thomas, and Officer Bernice Dawson

OF COUNSEL:

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**CERTIFICATE OF SERVICE**

I hereby certify that an exact copy of the foregoing instrument has been served (a) through the Court's e-filing system; (b) by placing a copy of same in the United States Mail, postage prepaid and properly addressed; and/or (c) by personal/firm e-mail to

Mr. Alonzo Austin  
1321 Oliver-Carlis Road  
Tuskegee, AL 36083

on this the 13th day of November, 2007.

s/S. Mark Dukes  
OF COUNSEL